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U.S. DEPARTMENT OF LABOR  
Office of the Chief Information Officer

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**Draft Guidelines for Ensuring and  
Maximizing the Quality, Objectivity,  
Utility, and Integrity of Information  
Disseminated by the Department of  
Labor**

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May 1, 2002

## **PREFACE**

The purpose of this draft guidance is to provide an overview of the Department of Labor (Department's) efforts to ensure and maximize the quality, objectivity, utility, and integrity of information disseminated to the public. This guidance is required by Section 515 of the Treasury and General Government Appropriations Act for Fiscal Year 2001 and associated Office of Management and Budget (OMB) implementation guidance.

The Department welcomes comments on this draft document for a 60-day period. Under law and OMB guidelines published in the Federal Register, the Department will be submitting its draft guidelines to OMB for review only after providing an opportunity for public comment and making any appropriate revisions. At this early stage of the process, as the Department works to implement this new program, it would be particularly helpful if the public would share with us its experiences with Department of Labor information programs and its views on any provisions of these draft guidelines.

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## **INTRODUCTION**

### **Background**

On December 21, 2000 Congress passed Section 515 of the Treasury and General Government Appropriations Act for Fiscal Year 2001<sup>1</sup> (the Act). OMB issued final guidance<sup>2</sup> for implementing the Act, which required all Federal agencies to:

- Issue information quality guidelines ensuring and maximizing the quality, objectivity, utility, and integrity of information, including statistical information, disseminated by the Department;
- Establish administrative mechanisms allowing affected persons to seek and obtain correction of information maintained and disseminated by the Department that does not comply with the OMB guidelines, and;
- Report to the Director of OMB the number and nature of complaints received regarding compliance with the OMB guidelines, including how the complaints were resolved.

The OMB guidance directed Federal agencies to publish their draft Information Quality guidelines on their websites by April 1, 2002. OMB further clarified on March 4, 2002 that the website publishing date was extended to May 1, 2002.

The Department will host a 60-day public comment period beginning May 1, 2002 and provide a revised draft to OMB no later than August 1, 2002. In accordance with OMB's timeline, the Department will publish notice of this report in its final form in the Federal Register and post its final Information Quality guidelines on its website no later than October 1, 2002.

The Department invites public comment on these draft guidelines. To help facilitate this process, Appendix I includes a list of questions that the Department would like the public to address. These same questions also appear within the appropriate sections of the document.

### **Purpose**

The purpose of this draft guidance is to describe those practices that can best help the Department and its agencies – the organizations that collectively constitute the Department of Labor – to achieve its goal of information quality; to provide the necessary guidance to Departmental agencies; to assign responsibilities; and to describe the information quality complaint and appeal process required by law and OMB guidelines. The Departmental draft guidelines are structured to focus awareness, understanding, and adherence to the Department's overall approach to ensuring the quality of the information it disseminates.

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<sup>1</sup> Public Law 106-554, App. C.

<sup>2</sup> See Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies; Notice; Republication; Office of Management and Budget, Federal Register Vol. 67, No. 36, pp. 452-460, February 22, 2002.

## **SCOPE AND APPLICABILITY**

These draft guidelines are intended, within the context of laws administered and enforced by the Department of Labor, to meet OMB's objective of improving information quality. They are intended to improve the internal management of the Federal government. They are not intended to impose any binding requirements or obligations on the Department or the public or to create any right or benefit, substantive or procedural, enforceable at law by a party against the United States, its agencies, officers, or any person. They are not intended to provide any right to judicial review. A Departmental agency may vary the application of information quality guidelines in particular situations where it believes that other approaches will more appropriately carry out the purpose of these guidelines or will help an agency to meet its statutory or program obligations.

These draft guidelines apply to information disseminated by the Department on or after October 1, 2002. Information means any communication or representation of knowledge such as facts or data, in any medium or form, including textual, numerical, graphic, cartographic, narrative, or audiovisual forms. Dissemination includes agency initiated or sponsored distribution of information to the public, but does not include agency citation to or discussion of information that was prepared by others and considered by the agency in the performance of its responsibilities. These guidelines do not apply to the following:

- Information distribution limited to government employees, or agency contractors, or grantees;
- Intra- or inter-agency use or sharing of government information, such as strategic plans, performance plans, program reports, operating plans, or budgets;
- Responses to requests for agency records under the Freedom of Information Act, the Privacy Act, the Federal Advisory Committee Act, or other similar laws;
- Correspondence, or other communications with individuals, or organizations;
- Press releases;
- Archival records;
- Public filings;
- Subpoenas or adjudicative processes;
- Information clearly represented as opinion and not an official agency or Departmental representation;
- Policy guidance or statements or summaries of agency policies, procedures, or programs.
- Statements of legal policy or interpretation; and
- Final agency decisions or determinations of legal force and effect, such as wage determinations.

For a glossary of numerous terms and their definitions used throughout the rest of this document, please consult Appendix II. The definitions are from the OMB guidance for the Act.

## QUALITY MANAGEMENT PRINCIPLES

In accordance with OMB's guidelines, Departmental agencies are responsible for assuring the quality of the information that they disseminate. The level of quality should be "appropriate to the nature and timeliness of the information to be disseminated." This level of quality will, of course, be affected by the resources available and the nature of the underlying data. Quality includes the "utility," "objectivity," and "integrity" of the information. Agencies should assess the value of particular information to those expected to use it. The objectives of the Department's information programs are the development of information that is "accurate, reliable, and unbiased," the presentation of information "in an accurate, clear, complete, and unbiased manner," and the protection of information from unauthorized access or revision. These objectives and guidelines are to be interpreted consistent with the Department's statutory obligations.

Where agencies are disseminating information of a scientific, financial, or statistical nature, they should use sound statistical and research methods to develop and analyze the data. Depending on the type of information disseminated, and consistent with statutory and confidentiality restrictions, agencies should identify the sources of the information, and where appropriate, the supporting data, models, and error sources.

Where agencies develop and disseminate "influential" scientific, financial, or statistical information, they should provide a higher level of transparency about data and methods such that, if feasible and appropriate under the circumstances and if confidentiality constraints permit, qualified third parties could reproduce the information.

With regard to analysis of risks to human health, safety, and the environment maintained or disseminated by agencies, the Department shall either adopt or adapt the quality principles applied by Congress to risk information used and disseminated pursuant to the Safe Drinking Water Act Amendments of 1996. [The Occupational Safety and Health Administration](#) and the [Mine Safety and Health Administration](#) risk analysis details are now available.

## INFORMATION QUALITY RESPONSIBILITIES

It is the responsibility of all Departmental agencies to make information quality an important goal in every appropriate phase of a product's development. The following responsibilities pertain to the implementation of the Department's quality guidelines.

### Chief Information Officer (CIO)

- Maintain a leadership role in overseeing the implementation of these guidelines and in providing guidance to the agencies on information quality matters.
- Develop and submit to OMB the annual report on the number, nature, and resolution of complaints.
- Coordinate, as appropriate, with other Federal organizations on cross-agency information quality issues.

**Agency Heads**

- Apply, consistent with applicable statutes and regulations, the Department's information quality policies, procedures, and guidance to Department-sponsored information products that an agency has direct authority to control.
- Ensure that, where Department-sponsored information does not necessarily reflect the views of the Department, an appropriate disclaimer will be included.

**INFORMATION CATEGORIES**

Per OMB's guidance, information means any communication or representation of knowledge such as facts or data, in any medium or form, including textual, numerical, graphic, cartographic, narrative, or audiovisual forms. This definition includes information that an agency disseminates from a web page, but does not include the provision of hyperlinks to information that others disseminate. This definition does not include opinions, where the agency's presentation makes it clear that what is being offered is someone's opinion rather than fact or the agency's views.

The Department has identified two categories of information that are disseminated to the public, with the level of quality control and review being greater for influential information than for non-influential information. Whether information is influential is to be determined on an item-by-item basis rather than by aggregating multiple studies, documents, or other informational items that may influence a single policy or decision.

***Influential***

**Definition:** Per OMB guidance, this category contains scientific, financial, or statistical information when agencies can reasonably determine that dissemination will have or does have a clear and substantial impact on important public policies or important private sector decisions.

**Examples:** Principal economic indicators, such as Consumer Price Index, the Employment Situation, and Producer Price Index; The Private Pension Bulletin, and Unemployment Insurance Weekly Claims data.

***Non-influential***

**Definition:** All information disseminated to the public that does not meet the criteria set forth in the Influential information definition.

**Examples:** Fact sheets (e.g., Disaster Unemployment Assistance, Injury Trends in Mining), OSHA Construction Resource Manual, technical information issuances, accident prevention bulletins, annual reports, and studies (e.g., Pension and Health Benefits of American workers, Coverage Status of Workers under Employer-Provided Pension Plans, Study of 401(k) Plan Fees and Expenses, Study of Health Insurance Coverage of the Unemployed).

***Request for Public Comment***

The Department welcomes public comment regarding whether the descriptions of the information categories are clear and useful.

## **INFORMATION QUALITY ASSURANCE TECHNIQUES AND METHODS**

There are numerous techniques and methods agencies can utilize to ensure they consistently produce and disseminate quality information. Appendix III provides some sample techniques and methods derived from industry best practices. Agencies should use the information quality assurance techniques and methods that they determine are most appropriate for their information products.

## **PRIVACY AND SECURITY INFORMATION**

Regardless of the category of information, all agencies will comply with the Privacy and Security Statement posted on the Department's website. The Department is strongly committed to maintaining the privacy of information and the security of its computer systems. With respect to the collection, use, and disclosure of information, the Department makes every effort to ensure compliance with applicable Federal laws, including, but not limited to, the Privacy Act of 1974, the Paperwork Reduction Act of 1995, the Trade Secrets Act, and the Freedom of Information Act.

As part of its efforts to ensure and maintain the integrity of the information disseminated to the public, the Department's IT security policy and planning framework is designed to protect information from unauthorized access or revision and to ensure that the information is not compromised through corruption or falsification.

## **INFORMATION QUALITY ASSURANCE PROCESS**

Use by Department of Labor agencies of the quality assurance process described below will help maximize the quality of information disseminated. Agencies will be encouraged to use information quality assurance processes that are appropriate to the complexity and importance of the product being developed. Agencies may use appropriate pre-existing information quality assurance processes provided the level of quality assurance rigor used by the agency meets or exceeds the quality assurance principles set forth by the Department and OMB.

The quality assurance process should begin at the inception of the product development process. At the initiation of the product development process, the agency should consult existing Departmental and agency information quality assurance guidelines. The agency should determine the information category of the product to be developed, the level of quality assurance needed, and the appropriate techniques required to maximize and ensure information quality.

The agency should incorporate the selected quality assurance techniques into the project development schedule. Throughout the product's development, the agency should ensure that quality assurance decisions are defensible and appropriate to the category of information involved. The product may be subject to internal agency quality controls and any appropriate Departmental reviews before being disseminated to the public. The agency should be responsible for ensuring that lessons learned are incorporated into future information product development activities so as to improve the Department's overall quality management process.

## INFORMATION COMPLAINT AND APPEAL PROCESS

Because the Department is committed to information dissemination programs based on high standards of quality, it recognizes the value of public input. The Department therefore encourages the affected public to suggest improvements in Departmental information practices and to contact it when particular disseminated information may not meet the guidelines set forth above. The Department believes that in most cases, informal contacts would be appropriate.

Sometimes agencies and affected persons may find it helpful to resolve concerns about information in a more structured way and may choose to follow a more formal process. Each agency may designate one or more officials to review information complaints and another official or officials whom the complainant may contact if dissatisfied with the initial response to the complaint. The agency should generally provide that the official conducting the second level review is not the same official that responded to the initial request or from the same office that prepared the information in question. Designated agency officials may consult with other agency or Departmental offices, as the agency may deem appropriate to the resolution of the complaint.

*The purpose of the information complaint and appeal process is to deal with information quality matters, not to resolve underlying substantive policy or legal issues.*

As in the case with other provisions of these guidelines, the process is intended to improve the internal management of the Federal government. It is not intended to create any right or benefit, substantive or procedural, enforceable at law by a party against the United States, its agencies, officers, or any person. It is not intended to provide any right of judicial review. Moreover, this process is not intended to substitute for other legally authorized processes, such as the Privacy Act or the rulemaking processes. Concerns regarding information in a rulemaking must be presented in the rulemaking in accordance with the rulemaking's procedures.

### Overview of Information Complaint and Appeal Process

Affected persons may indicate their interest in following a more structured complaint and appeal process by expressing that interest to the concerned agency. Complainants must identify themselves and indicate where and how they can be reached. They also must identify, as specifically as possible, the information in question and carefully describe the nature of the complaint, including an explanation of why they believe the information does not comply with OMB, Departmental, or agency-specific guidelines, and the reason why the agency should make the change. Failure to include this information may result in a complainant not receiving a response to the complaint or greatly reducing the usefulness or timeliness of any response.

#### ***Request for Public Comment***

The Department welcomes public comment regarding whether the information requested from complainants is adequate to assure that complaints can be properly evaluated.

In deciding how to handle complaints, agencies should be especially mindful of their legal obligations, program priorities, resource constraints, and their duty to use resources efficiently. For example, agencies have important responsibilities to issue rules and provide compliance guidance to the public. Agencies must administer the complaint and appeal process consistent with these obligations and their responsibilities to carry them out in an expeditious manner.

Any structured process would not apply to an agency's archival information or to public filings. Agencies may choose not to respond to complaints about claimed defects that are frivolous or unlikely to have substantial future impact. It may not be in the public interest for agencies to devote significant resources to correcting information where the expenditure of such resources is not, in the agency's view, cost effective in light of the significance of the asserted error, the benefits that are likely to be derived from such a correction, the costs of the correction, and the agency's more pressing priorities and obligations. Where procedures exist for dealing with information quality issues, agencies may consider resolving complaints by referring them to these procedures. For example, complaints about the quality of information in a rulemaking are to be submitted and handled in accordance with rulemaking procedures. Where an agency responds directly to a complaint, it should respond in the manner that it deems most suitable, whether by letter, telephone, email, or otherwise.

The Department and agencies should try to respond to complaints and appeals within ninety (90) days of their receipt, unless they deem a response within this time period to be impracticable, in light of the nature of the complaint and the agency priorities.

If an affected person is dissatisfied with the initial response to the complaints, the complainant may seek review by the official that the agency has designated to hear such appeals. A complainant may appeal within thirty (30) days of the date the agency notified the complainant how it would handle the complaint or 120 days from the date on which an agency or agencies first received the complaint, whichever is later. The appeal request must contain the same contact and descriptive information that was provided in the original complaint and the specific reasons why the initial Department or agency response was not satisfactory.

In processing initial complaints and appeal requests, agencies should be flexible and take into account, among other things, the nature, significance, and volume of complaints, the agency's particular program needs, and available review mechanisms.

Agencies should be prepared to vary their procedures if they believe that other approaches are more suitable to carrying out their mission or would facilitate compliance with the purposes of these guidelines. Moreover, the Department welcomes any suggestions from the public at any time concerning the improvement of this draft complaint and appeal process.

***Request for Public Comment***

The Department welcomes public comment regarding the adequacy of the time frames set forth in the Information Complaint and Appeal Process.

**TRACKING AND REPORTING INFORMATION COMPLAINTS AND APPEALS**

The scope of data collected, data collection process, and data reporting methodologies will be provided at a later date.

## **APPENDIX I: QUESTIONS FOR PUBLIC COMMENT**

The Department invites the public to address questions including, but not limited to, those listed below that pertain to specific topics referenced in the guidelines:

1. The Department welcomes public comment regarding whether the descriptions of the information categories are clear and useful.
2. The Department welcomes public comment regarding whether the information requested from complainants is adequate to assure that complaints can be properly evaluated.
3. The Department welcomes public comment regarding the adequacy of the time frames set forth in the information complaint and appeal process.
4. The Department welcomes public comment regarding whether the sample information quality assurance techniques and methods provided in Appendix III are clear and useful.

## APPENDIX II: INFORMATION QUALITY GLOSSARY

OMB provides the following definitions in its guidance for the Act.

1. “**Quality**” is an encompassing term comprising utility, objectivity, and integrity. Therefore, the guidelines sometimes refer to these four statutory terms, collectively, as “quality.”
2. “**Utility**” refers to the usefulness of the information for its intended users, including the public. In assessing the usefulness of information that the agency disseminates to the public, the agency needs to consider the uses of information not only from the perspective of the agency but also from the perspective of the public. As a result, when transparency of information is relevant for assessing the information’s usefulness from the public’s perspective, the agency must take care to ensure that transparency has been addressed in its review of the information.
3. “**Objectivity**” involves two distinct elements, presentation and substance.
  - a. “Objectivity” includes whether disseminated information is being presented in an accurate, clear, complete, and unbiased manner. This involves whether the information is presented within a proper context. Sometimes, in disseminating certain types of information to the public, other information must also be disseminated in order to ensure an accurate, clear, complete, and unbiased presentation. Also, the agency needs to identify the sources of the disseminated information (to the extent possible, consistent with confidentiality protections) and, in scientific, financial, or statistical context, the supporting data and models, so that the public can assess for itself whether there may be some reason to question the objectivity of the sources. Where appropriate, supporting data should have full, accurate, transparent documentation, and error sources affecting data quality should be identified and disclosed to users.
  - b. In addition, “objectivity” involves a focus on ensuring accurate, reliable, and unbiased information. In a scientific, financial, or statistical context, the original and supporting data shall be generated, and the analytical results shall be developed, using sound statistical and research methods.
    - i. If data and analytic results have been subjected to formal, independent, external peer review, the information may generally be presumed to be of acceptable objectivity. However, this presumption is rebuttable based on a persuasive showing by the petitioner in a particular instance. If agency-sponsored peer review is employed to help satisfy the objectivity standard, the review process employed shall meet the general criteria for competent and credible peer review recommended by OMB-OIRA to the President’s Management Council (9/20/01) ([http://www.whitehouse.gov/omb/inforeg/oira\\_review-process.html](http://www.whitehouse.gov/omb/inforeg/oira_review-process.html)), namely, “that (a) peer reviewers be selected primarily on the basis of necessary technical expertise, (b) peer reviewers be expected to disclose to agencies prior technical/policy positions they may have taken on the issues at hand, (c) peer reviewers be expected to disclose to agencies their sources of personal and institutional funding (private or public sector), and (d) peer reviews be conducted in an open and rigorous manner.”
    - ii. If an agency is responsible for disseminating influential scientific, financial, or statistical information, agency guidelines shall include a high degree of transparency about data and methods to facilitate the reproducibility of such information by qualified third parties.

- A. With regard to original and supporting data related thereto, agency guidelines shall not require that all disseminated data be subjected to a reproducibility requirement. Agencies may identify, in consultation with the relevant scientific and technical communities, those particular types of data that can practicably *[sic]* be subjected to a reproducibility requirement, given ethical, feasibility, or confidentiality restraints. It is understood that reproducibility of data is an indication of transparency about research design and methods and thus a replication exercise (i.e., a new experiment, test, or sample) shall not be required prior to each dissemination.
  - B. With regard to analytic results related thereto, agency guidelines shall generally require sufficient transparency about data and methods that a qualified member of the public could undertake an independent reanalysis. These transparency standards apply to agency analysis of information from multiple studies.
    - i Making the data and methods publicly available will assist in determining whether analytic results are reproducible. However, the objectivity standard does not override other compelling interests such as privacy, trade secrets, intellectual property, and other confidentiality protections.
    - ii In situations where public access to data and methods will not occur due to other compelling interests, agencies shall apply especially rigorous robustness checks to analytic results and document what checks were undertaken. Agency guidelines shall, however, in all cases, require a disclosure of the specific quantitative methods and assumptions that have been employed. Each agency is authorized to define the type of robustness checks, and the level of detail for documentation thereof, in ways appropriate for it given the nature and multiplicity of issues for which the agency is responsible.
  - C. With regard to analysis of risks to human health, safety, and the environment maintained or disseminated by the agencies, agencies shall either adopt or adapt the quality principles applied by Congress to risk information used and disseminated pursuant to the Safe Drinking Water Act Amendments of 1996 (42 U.S.C. 300g-1(b)(3)(A) and (B)). Agencies responsible for dissemination of vital health and medical information shall interpret the reproducibility and peer review standards in a manner appropriate to assuring the timely flow of vital information from agencies to medical providers, patients, health agencies, and the public. Information quality standards may be waived temporarily by agencies under urgent situations (e.g., imminent threats to public health or homeland security) in accordance with the latitude specified in agency-specific guidelines.
- 4. “**Integrity**” refers to the security of information – protection of the information from unauthorized access or revision, to ensure that the information is not compromised through corruption or falsification.
  - 5. “**Information**” means any communication or representation of knowledge such as facts or data, in any medium or form, including textual, numerical, graphic, cartographic, narrative, or audiovisual forms. This definition includes information that an agency disseminates from a web page, but does not include the provision of hyperlinks to information that others disseminate. This definition does not include opinions, where the agency’s presentation makes it clear that what is being offered is someone’s opinion rather than fact or the agency’s views.

6. **“Government information”** means information created, collected, processed, disseminated, or disposed of by or for the Federal Government.
7. **“Information dissemination product”** means any book, paper, map, machine-readable material, audiovisual production, or other documentary material, regardless of physical form or characteristic, an agency disseminates to the public. This definition includes any electronic document, CD-ROM, or web page.
8. **“Dissemination”** means agency-initiated or sponsored distribution of information to the public (see 5 CFR 1320.3(d) (definition of “Conduct or Sponsor”). Dissemination does not include distribution limited to government employees or agency contractors or grantees; intra- or inter-agency use or sharing of government information; and responses to requests for agency records under the Freedom of Information Act, the Privacy Act, the Federal Advisory Committee Act, or other similar law. This definition also does not include distribution limited to correspondence with individuals or persons, press releases, archival records, public filings, subpoenas, or adjudicative processes.
9. **“Influential”** when used in the phrase “influential scientific, financial, or statistical information” means that the agency can reasonably determine that dissemination of the information will have or does have a clear and substantial impact on important public policies or important private sector decisions. Each agency is authorized to define “influential” in ways appropriate for it given the nature and multiplicity of issues for which the agency is responsible.
10. **“Reproducibility”** means that the information is capable of being substantially reproduced, subject to an acceptable degree of imprecision. For information judged to have more (less) important impacts, the degree of imprecision that is tolerated is reduced (increased). If agencies apply the reproducibility test to specific types of original or supporting data, the associated guidelines shall provide relevant definitions of reproducibility (e.g., standards for replication of laboratory data). With respect to analytic results, “capable of being substantially reproduced” means that independent analysis of the original or supporting data using identical methods would generate similar analytic results, subject to an acceptable degree of imprecision or error.

### APPENDIX III: SAMPLE INFORMATION QUALITY ASSURANCE TECHNIQUES AND METHODS

The table below provides some sample techniques and methods derived from industry best practices. This is not intended to be an exhaustive list. Which techniques and methods are used and how they are applied depends upon the complexity, influence, and subject matter of each product.

Techniques and Methods	Definition	Applicability
Peer Review	An independent assessment of the technical and scientific merit of research by individuals with sufficient technical competence and no unresolved conflict of interest.	Peer review is often appropriate for scientific studies.
Certification	Process of reviewing information prior to official release to ensure that erroneous data are not released, or to identify data of marginal quality. It is often conducted concurrently with an interpretative analysis of the data.	Managerial discretion is needed to determine the appropriate amount of evaluation for a given statistical program or product. Factors to be considered include the uses and users of the data, the potential for error and its significance to the use of the data, the variation in quality over time, the cost of the evaluation relative to the overall cost of the statistical program, and the potential for improvement in quality, efficiency, or productivity.
Performance Measures	At the onset of a project, a measure is determined to evaluate performance. Outcomes are rated against the original measure.	Performance Measures should be used to help management track and improve information quality, but they generally should also be used in conjunction with other, more rigorous quality assurance techniques.
Check Lists	A specific, step-based plan designed to ensure all appropriate actions are taken.	Notes the steps in production that can identify inconsistencies, mistakes, or weaknesses, and ensure completeness.
Bureau of Labor Statistics (BLS) Handbook of Methods	Explains how the BLS obtains and prepares the economic data it publishes.	Applicable to statistical data collected by the BLS; and includes approaches and methodologies that could be appropriate for other agencies.

#### ***Request for Public Comment***

The Department welcomes public comment regarding whether the Sample Information Quality Assurance Techniques and Methods provided are clear and useful.